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17 October 2000  
C6-BRC-L-00-002



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
Los Angeles Region  
320 W. 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

Attention: John Geroch

Re: **GROUNDWATER MONITORING PLAN, GROUNDWATER  
INVESTIGATION WORK PLAN, AND GROUNDWATER  
INVESTIGATION FOR ARSENIC AT PARCEL D.  
BOEING REALTY CORPORATION, FORMER C-6 FACILITY,  
19503 SOUTH NORMANDIE AVENUE, LOS ANGELES**

Dear Mr. Geroch:

Boeing Realty Corporation (BRC) received a letter dated January 7, 2000 requesting a groundwater monitoring plan and groundwater investigation work plan. BRC also received a notice of noncompliance dated March 16, 2000 and a letter dated February 25, 2000 requesting a groundwater investigation for arsenic at Parcel D.

#### **Groundwater Monitoring Plan**

BRC recently collected groundwater quality samples and groundwater elevation measurements from 30 existing on-site monitoring wells. The results of this monitoring event are presented in the "Groundwater Monitoring Report, 2<sup>nd</sup> Quarter 2000" dated July, 2000. In addition, the Department of Toxic Substances Control (DTSC) has directed TRC to conduct an additional groundwater quality investigation on Parcel B to determine the lateral and vertical extent of the groundwater contaminant plume migrating from the former International Light Metals (ILM) facility to the former C-6 Facility.

BRC will use this above information to develop an effective site-wide groundwater monitoring plan, which will be submitted to you by December 15, 2000. The monitoring wells at the former C-6 Facility were installed from 1987 to 1998 and extensive historical data is available for many of these wells. BRC will, therefore,

propose to reduce the number of wells included in the monitoring network and reduce the monitoring frequency.

#### **Groundwater Investigation Work Plan to Evaluate Contaminant Migration from Parcel C to Parcel B**

The Board's letter dated January 7, 2000, also requested BRC submit a work plan to investigate the extent of groundwater contamination migrating from Parcel C to Parcel B. A notice of noncompliance dated March 16, 2000, informed BRC that the Board had not received the groundwater monitoring plan or groundwater investigation work plan by the required due dates. During a meeting with you on April 6, 2000, you stated that you would defer the requirement for the groundwater monitoring and sampling plan and the groundwater investigation work plan by BRC until DTSC had completed its investigation of the migration of contaminants from ILM beneath Parcel B. It is our understanding that a copy of ILM's work plan "Additional Offsite Ground Water RCRA Facility Investigation Workplan" dated September 11, 2000, was sent to your office for review and comment.

#### **Groundwater Investigation for Arsenic at Parcel D**

The Board's letter dated February 25, 2000, directed BRC to conduct a groundwater investigation at Parcel D to evaluate the presence of arsenic in the underlying groundwater. Groundwater monitoring well XMW-09, which was installed by Montrose Chemical Corporation, is optimally located in proximity to the arsenic soil excavation and, therefore, will be sampled for arsenic by BRC. Results from this investigation will be submitted to you by November 10, 2000.

Please call me at (562) 593-8623 if you have any questions.

Sincerely,



Stephanie Sibbett  
Boeing Realty Corporation

Cc: Mario Stavale, Boeing Realty Corporation  
Steve Shestag, The Boeing Company

